

Glenn S. Richards
Phone: 202.663.8215
glenn.richards@pillsburylaw.com

November 13, 2009

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room 4-C224
Washington, DC 20554

**Re: REQUEST FOR CONFIDENTIAL TREATMENT
Head Start Telecom Inc.
WC Docket No. 09-197 (formerly filed in CC Docket No. 96-45)**

Dear Ms. Dortch:

Head Start Telecom, Inc. ("Head Start"), by its counsel, hereby requests confidential treatment for the attached response to staff questions in the above-referenced proceeding related to Head Start's Forbearance Petition.¹

The attached response contains confidential business information, the disclosure of which would result in competitive harm. Accordingly, Head Start submits that the public interest would be served by grant of this request for confidential treatment.² In conformity with Section 0.459(b) of the Commission's rules, Head Start submits the following:

47 C.F.R. § 0.459(b)(1) -- Identification of the specific information for which confidential treatment is sought

Head Start requests confidential treatment of the attached response to staff questions asked in the above-referenced proceeding.

47 C.F.R. § 0.459(b)(2) -- Identification of the Commission proceeding in which the information was submitted or a

¹ The original petition and comments were filed in CC Docket No. 96-45. On November 2, 2009, the FCC released a public notice stating that all future filings, communications and proceedings involving eligible telecommunications carriers, including forbearance petitions, should be filed in newly established WC Docket No. 09-197. Public Notice, DA 09-2357 (November 2, 2009).

² A redacted copy of this filing has not been included but one will be filed in the docket.

**description of the circumstances giving rise to
the submission**

This information is being filed in WC Docket 09-197.

**47 C.F.R. § 0.459(b)(3) -- Explanation of the degree to which the
information is commercial or financial, or
contains a trade secret or is privileged**

The supplemental response for which confidentiality is sought contains proprietary and sensitive business information regarding Head Start's future business plans.

**47 C.F.R. § 0.459(b)(4) -- Explanation of the degree to which the
information concerns a service that is subject to
competition**

The information contained in the supplemental response concerns the market for wireless services. Head Start competes with a number of wireline and wireless companies providing similar services.

**47 C.F.R. § 0.459(b)(5) -- Explanation of how disclosure of the information
could result in substantial competitive harm**

Disclosure of the information provided in Head Start's response would result in substantial competitive harm. The supplemental response contains sensitive commercial information and would reveal competitive strengths and weaknesses that, if disclosed, could be exploited by a business rival.

**47 C.F.R. § 0.459(b)(6) -- Identification of any measures taken by the
submitting party to prevent unauthorized
disclosure**

Head Start has limited the distribution of the confidential information to authorized employees or agents.

**47 C.F.R. § 0.459(b)(7) -- Identification of the whether the information is
available to the public and the extent of any
previous disclosure of the information to third
parties**

The information for which confidential treatment is sought is not publicly available. In addition, there has been no intended disclosure to third parties.

47 C.F.R. § 0.459(b)(8) -- Justification of the period during which the submitting party asserts that material should not be available for public disclosure

There is no public benefit to be derived from disclosure of the confidential information. However, as discussed above, there is the potential for substantial competitive harm to Head Start if the information is disclosed. Therefore, the confidential information included in the supplemental response should be withheld permanently from public disclosure.

47 C.F.R. § 0.459(b)(9) -- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted

N/A.

Please contact either of the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Glenn Richards", with a stylized flourish at the end.

Glenn S. Richards
Counsel for Head Start
Telecom, Inc.

cc: Nicholas Degani, FCC (via email)

**RESPONSE TO STAFF QUESTIONS
OF
HEAD START TELECOM, INC.
WC Docket No. 09-197
November 12, 2009**

1. Provide a list of network providers for Head Start's wireless service.

RESPONSE REDACTED

2. Identify any and all states where Head Start has filed for ETC status

Head Start is certified as a wireline ETC in the state of Oklahoma.

3. Identify any other states where Head Start plans to apply for ETC status.

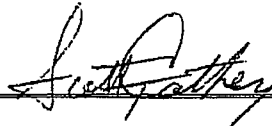
RESPONSE REDACTED

4. Provide an estimated number of Lifeline/Link-up subscribers Head Start expects to serve in the first 12 months following ETC certification.

RESPONSE REDACTED

Verification

I have read the foregoing response of Head Start Telecom, Inc. and the facts stated therein, other than those of which official notice may be taken, are true and correct to the best of my knowledge, information and belief.



Name: Scott Cathey

Title: Vice President Business Development

Date: November 12, 2009